

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BILL WISSER,

Plaintiff,

- against -

VOX MEDIA, INC.,

Defendant.

[illegible]

Case No. 1:19-cv-1445-LGS

Hon. Lorna G. Schofield

NOTICE OF MOTION FOR SANCTIONS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of Rachel F. Strom dated October 3, 2019, and all exhibits annexed thereto, and upon all prior proceedings, pleadings, and filings in this action, Defendant Vox Media, Inc., by and through their undersigned counsel, hereby moves this Court before the Honorable Lorna G. Schofield, at the Thurgood Marshall United States Courthouse, Courtroom 1106, 40 Centre Street, New York, New York, 10007, for an order granting sanctions against Plaintiff Bill Wisser and Plaintiff's counsel pursuant to this Court's inherent authority, Federal Rules of Civil Procedure 16(f), 26(g), 37(a), (b), & (d), and 28 U.S.C. § 1927.

In accordance with the schedule set by the Court (Dkt. 33), Plaintiff's answering papers shall be filed and served on October 24, 2019, and Defendant's reply papers shall be filed and served on November 7, 2019.

Dated: October 3, 2019

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/ Rachel F. Strom
Rachel F. Strom

Caesar Kalinowski (*pro hac vice* application forthcoming)

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